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USDOC FOR 532/OEA/LHINES/DFARROW
USDOC FOR 3132 FOR FCS/OIO REGIONAL DIRECTOR WILLIAM ZARIT
BICE FOR OFFICE OF STRATEGIC INVESTIGATIONS

SIPDIS

E.O. 12958: N/A
TAGS: [BMGT](#) [BEXP](#) [HK](#) [ETRD](#) [ETTC](#)
SUBJECT: EXTRANCHECK: POST SHIPMENT VERIFICATION: ROHM AND HAAS
ELECTRONIC MATERIALS

REF: A) USDOC 00994

1.Unauthorized disclosure of the information provided below is prohibited by Section 12C of the Export Administration Act.

¶2. As per reftel A request and at the direction of the Office of Enforcement Analysis (OEA) of the USDOC Bureau of Industry and Security (BIS), Export Control Officer Philip Ankel (ECO), accompanied by Commercial Assistant, Sandy Lai, conducted a post shipment verification (PSV) at Rohm and Haas Electronic Materials Asia Limited (Rohm & Haas), 15 On Lok Mun Street, New Territories, Hong Kong. The items in question are 31 drums of EBR-10A Edge Bead Remover valued at USD 12,666. No export control classification number (ECCN) was included on the relevant shipping documents although related documentation provided by OEA states that the items are classified as EAR99 (subject to the Export Administration Regulations but not separately listed on the Commerce Control List). Items properly classified as EAR99 may be exported/reexported to virtually all destinations and end-users worldwide, license free. The exporter is Rohm and Haas Electronic Materials LLC of Marlborough, Massachusetts.

¶3. According to the Hong Kong Companies Registry, Rohm and Haas has been in existence since 1979 (originally incorporated as Lea-Ronal (S.E. Asia) Limited. A review of the relevant website (www.electronicmaterials.rohmhaas.com) indicates that the company is an affiliate of Rohm and Haas Electronic Materials LLC in Marlborough, Massachusetts (the exporter). The Hong Kong Rohm and Haas affiliate's main business is importation and exportation of electroplating chemicals for PCB boards, resistors and other electronic components.

¶4. The ECO, accompanied by Commercial Assistant, Sandy Lai visited Rohm and Haas at the address referenced above on March 7, 2007 and met with Grace S.K. Cheung, Trade Compliance Specialist, Asia Pacific. She provided background on Rohm and Haas and its business as well as its worldwide and Hong Kong specific compliance program.

¶5. Ms. Cheung provided a spreadsheet of the various customers for the applicable chemicals. She was not able to provide documentation on the specific customers that received the particular shipment in question because the chemicals were ordered for stock and delivered to customers as they purchased them. Customers listed on the spreadsheet provided by Ms. Cheung included CR Semiconductor, CSMC Technologies, Daily Silver Imp Microelectron, Hunan Puzhao Information, RCL Semiconductor, Ltd., Shanghai Epic Music Entertainment, Shanghai SIM-BCD Semiconductor, Shijaizhuang Concord Electronics, Tianjin Zhonghuan Semiconductor, and Wuxi Zhongwei Microchips Co.

¶6. Ms. Cheung is quite familiar with U.S. and Hong Kong export

controls (as her title would suggest). She had met the ECO at the recent BIS/MOFCOM seminar on export controls. She stressed that Rohm and Haas has a strong worldwide export compliance program that makes use of SAP and Global Trade Solutions software. She stated that she is part of the company's global compliance network and her regional supervisor is located in Singapore.

¶7. At the time visited, Rohm and Haas appeared to be a suitable recipient of the chemicals in question since Rohm and Haas cooperated with the PSV and provided all requested information concerning the final disposition of the items. At the same time, the ECO was not able to inspect the subject items as they had already been delivered to the customers of Rohm and Haas or put into stock. Consistent with guidance on reporting of PSVs where the items cannot be physically inspected, the ECO recommends that this PSV be classified as Limited.

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